

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:)	
)	Chapter 11
)	
GWG HOLDINGS, INC., <i>et al.</i> , ¹)	Case No. 22-90032 (MI)
)	
Debtors.)	(Jointly Administered)
)	

NOTICE OF APPEARANCE AND REQUEST FOR NOTICES AND PAPERS

PLEASE TAKE NOTICE that the attorneys listed below hereby appear as proposed counsel to Jeffrey S. Stein, Anthony R. Horton, and David F. Chavenson, the Independent Directors on the Board of Directors of GWG Holdings, Inc. and members of the Investigation Committee of the Board and Special Committee of the Board, in the above-captioned chapter 11 cases, pursuant to Rules 2002, 3017(a), 9007 and 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), the Bankruptcy Local Rules of the United States Bankruptcy Court for the Southern District of Texas (the “Local Rules”), and sections 342 and 1109(b) of title 11 of the United States Code, 11 U.S.C. §§ 101, et seq. (the “Bankruptcy Code”), and hereby request that all notices given or required to be given and all papers served in these cases be delivered to and served upon the parties identified below at the following addresses:

Steven J. Reisman
KATTEN MUCHIN ROSENMAN LLP
50 Rockefeller Plaza
New York, NY 10020-1605
Telephone: (212) 940-8700
E-mail: sreisman@katten.com

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: GWG Holdings, Inc. (2607); GWG Life, LLC (6955); and GWG Life USA, LLC (5538). The location of Debtor GWG Holdings, Inc.’s principal place of business and the Debtors’ service address is 325 N. St. Paul Street, Suite 2650 Dallas, TX 75201. Further information regarding the Debtors and these chapter 11 cases is available at the website of the Debtors’ claims and noticing agent: <https://donlinrecano.com/gwg>.

-and-

Cindi M. Giglio
KATTEN MUCHIN ROSENMAN LLP
50 Rockefeller Plaza
New York, NY 10020-1605
Telephone: (212) 940-8587
E-mail: cgiglio@katten.com

-and-

Daniel Barnowski
KATTEN MUCHIN ROSENMAN LLP
2900 K Street NW
Washington, DC 2007-5118
Telephone: (202) 625-3661
E-mail: dan.barnowski@katten.com

-and-

Geoffrey M. King
KATTEN MUCHIN ROSENMAN LLP
525 West Monroe Street
Chicago, IL 60661-3693
Telephone: (312) 902-5506
E-mail: geoff.king@katten.com

-and-

John E. Mitchell
KATTEN MUCHIN ROSENMAN LLP
2121 North Pearl Street, Suite 1100
Dallas, TX 75201-2591
Telephone: (469) 627-7017
E-mail: john.mitchell@katten.com

PLEASE TAKE FURTHER NOTICE that pursuant to section 1109(b) of the Bankruptcy Code, the foregoing request includes not only the notices and papers referred to in the above-referenced Bankruptcy Rules and the Bankruptcy Code, but also includes, without limitation, all orders, applications, motions, petitions, pleadings, requests, complaints or demands, whether formal or informal, written or oral, transmitted or conveyed by mail delivery, hand-delivery, telephone, facsimile transmission or otherwise, in these cases.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance and Request for Notices and Papers (the “Notice”), nor any later appearance, pleading, proof of claim, claim or suit shall constitute a waiver of (i) the right to have final orders in non-core matters entered only after de novo review by a District Judge, (ii) the right to trial by jury in any proceeding related to, or triable in, these cases or any case, controversy or proceeding related to these cases, (iii) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) any objection to the jurisdiction of this Court for any purpose other

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than with respect to this Notice, (v) an election of remedy, or (vi) any other rights, claims, actions, defenses, setoffs or recoupments as appropriate, in law or in equity, under any agreements, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved.

Dated: June 21, 2022

Respectfully submitted,

KATTEN MUCHIN ROSENMAN LLP

/s/ Steven J. Reisman

Steven J. Reisman (*pro hac vice* admission pending)

Cindi M. Giglio (*pro hac vice* admission pending)

50 Rockefeller Plaza

New York, NY 10020-1605

Telephone: (212) 940-8700

Facsimile: (212) 940-8776

E-mail: sreisman@katten.com

cggiglio@katten.com

-and-

Daniel Barnowski (*pro hac vice* admission pending)

2900 K Street NW

Washington, DC 20007-5118

Telephone: (202) 625-3661

E-mail: dan.barnowski@katten.com

-and-

Geoffrey King (*pro hac vice* admission pending)

525 West Monroe Street

Chicago, IL 60661-3693

Telephone: (312) 902-5506

E-mail: geoff.king@katten.com

-and-

John E. Mitchell

2121 North Pearl Street, Suite 1100

Dallas, TX 75201-2591

Telephone: (469) 627-7017

E-mail: john.mitchell@katten.com

Proposed Counsel to Jeffrey S. Stein, Anthony R. Horton, and David F. Chavenson, the Independent Directors on the Board of Directors of GWG Holdings, Inc. and members of the Investigation Committee of the Board and Special Committee of the Board

CERTIFICATE OF SERVICE

I hereby certify that on June 21, 2022, I caused a true and correct copy of the foregoing *Notice of Appearance* to be electronically mailed to the parties that are registered or otherwise entitled to receive electronic notices in these cases pursuant to the Electronic Filing Procedures in this District.

/s/ Steven J. Reisman

Steven J. Reisman